

## Exhibit E

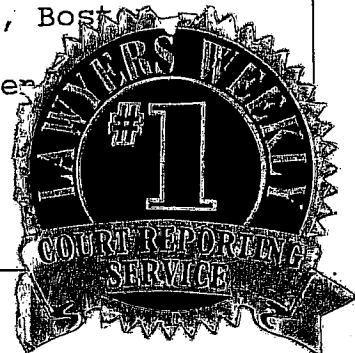
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1 UNITED STATES DISTRICT COURT  
 2 DISTRICT OF MASSACHUSETTS  
 3 Civil Action No.: 01CV10194DPW  
 4

5 STEPHEN KEEFE, )  
 6 Plaintiff, )  
 7 vs. )  
 8 LOCAL 805, INTERNATIONAL )  
 9 LONGSHOREMEN'S ASSOCIATION, AFL-CIO, )  
 10 LOCAL 800, INTERNATIONAL )  
 11 LONGSHOREMEN'S ASSOCIATION, AFL-CIO, )  
 12 and LOCAL 799, INTERNATIONAL )  
 13 LONGSHOREMEN'S ASSOCIATION, AFL-CIO, )  
 14 Defendants. )  
 15

16 DEPOSITION OF STEPHEN KEEFE, a witness  
 17 called on behalf of the Defendant pursuant to the  
 18 Massachusetts Rules of Civil Procedure, before  
 19 Mary P. Peacock, Professional Shorthand Reporter and  
 20 Notary Public in and for the Commonwealth of  
 21 Massachusetts at the offices of Angoff, Goldman,  
 22 Manning, Wanger & Hynes 24 School Street, Boston,  
 23 Massachusetts, on February 6, 2002, commencing  
 24 10:05 a.m.



1 Q. Who told you to go to Mr. Horohoe to obtain that  
2 letter?

3 MR. LATHROP: Objection to the form.

4 A. I don't remember who told me to.

5 Q. Did someone tell you to get the letter?

6 A. I don't remember.

7 Q. But in fact on May 24 you were working as a  
8 longshoreman and also doing other work for John T.  
9 Clark, isn't that true?

10 A. Yes.

11 Q. Are you still doing work for John T. Clark other than  
12 longshore work?

13 A. No.

14 Q. Mr. Keefe, I show you a document dated May 25th,  
15 2000. Is that your signature?

16 A. Yes.

17 Q. And did you date the document?

18 A. Yes.

19 Q. On May 25th, 2000?

20 A. Yes.

21 Q. And that's the Hiring Hall certification?

22 A. Yes.

23 Q. And it's -- it states that, "I pledge on my honor  
24 that I am available on a full-time basis and working